# **REMARKS**

The Office Action of September 18, 2009 has been received and its contents carefully considered.

Section 5 of the Office Action rejects all of the claims as being directed to non-statutory subject matter. With regard to independent claim 5, the Office Action refers to the so-called "machine-or-transformation test" established by *In re Bilski*. In response, claim 5 has been amended to recite that a data input step uses a data input section, which includes "a display monitor." It is respectfully submitted that the method now defined by claim 5 is adequately tied to a particular machine (a display monitor), and thus the rejection of claim 5 and its dependent claims should be withdrawn.

The Office Action also comments that the claims lack the necessary physical articles or objects to constitute a machine or manufacture under 35 USC 101. In response to this comment, claim 1 has also been amended to recite that a data input section includes a "display monitor." Accordingly, claim 1 now clearly includes a physical article or object, avoiding any question as to whether the claim is directed to a machine or a manufacture within the meaning of 35 USC 101. The rejection of claim 1 and its dependent claim should therefore be withdrawn.

Independent claim 6 has been amended so that it is now directed to a non-transitory computer-readable storage medium. This, too, is a physical object, so the rejection of claim 6 and its dependent claim should also be withdrawn.

Section 7 of the Office Action rejects claim 4 for indefiniteness. In response, claim 4 (and also claim 9) has been amended to avoid the term "and/or." Accordingly, the rejection should be withdrawn.

Section 9 of the Office Action rejects all of the independent claims (and several dependent claims) for anticipation by US patent 6,108,657 to Shoup et al. This reference will hereafter be called simply "Shoup" for short. In response, the independent claims have been amended to further define the invention over the Shoup reference.

The Shoup reference is directed to record management system that includes such features as a master table, a master table index, and a query map. The Office Action draws

particular attention to Figure 5 of the reference, and asserts that it shows various features recited in the original version of the claims.

The claims have been amended, though, to recite features that are not shown in Shoup's Figure 5 (or suggested by the rest of the reference either, for that matter). Claim 1, for example, now provides that the "processing section" includes a "summary operation processing section," a "specific operation processing section," a "group operation processing section," and a "time-series operation processing section." Claim 1 now also further defines the functions performed by the "processing section." Shoup neither discloses nor suggests a batch processing apparatus that includes the "processing section" in the current version of claim 1. Accordingly, the rejection should be withdrawn. Independent claims 5 and 6 have been amended to include recitations similar to those now appearing in claim 1, so the rejection should be withdrawn with respect to these claims, too.

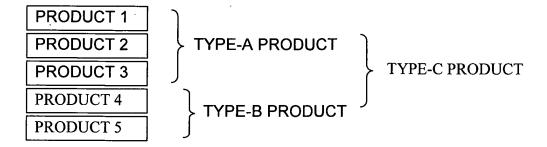
The remaining claims are dependent claims and are thus automatically patentable along with their independent claims.

The system disclosed in Shoup reference is capable of only outputting a part of the multidimensional cross-tabulation table. The system disclosed in the present application are superior to Shoup's system in several respects, which will be summarized below.

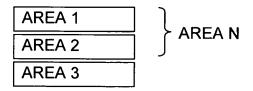
The system disclosed in the present application can output a cross tabulation according to dimensions that are nonexistent in the database, while Shoup's invention cannot.

For instance, if product codes are used as input data, the products might be characterized as in the example shown below. There are a number of cases in which a certain business enterprise may wish to look at the value of type-A products (identified as products 1, 2, and 3), type-B products (identified as products 4 and 5), and type-C products (identified as products 2, 3, and 4) other than the individual product values. However, only the product code information may be available as input data.

## PRODUCT CODE



#### AREA CODE



In such a case, if this relationship is registered in the repository disclosed in the present application as metadata, for instance, the following view of cross-tabulation Table 1 may be created.

## **CROSS-TABULATION TABLE 1**

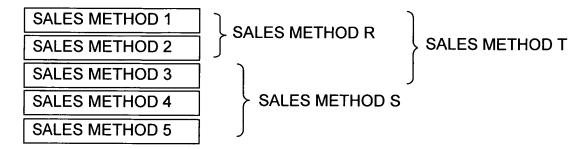
	PRODUCT 1	PRODUCT 2	PRODUCT 3	PRODUCT 4	PRODUCT 5	TYPE-A PRODUCT	TYPE-B PRODUCT	TYPE-C PRODUCT		
	SALES AMOUNT	SALES AMOUNT	SALES AMOUNT							
AREA 1	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX		
AREA 2	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX		
AREA 3	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX		
AREA A	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX	XXXX		
TOTAL AMOUNT	XXXX	XXXX	XXXX	XXXX	xxxx	XXXX	xxxx	XXXX		

The total amount of "AREA A," for example, is not a value obtained by simply summing up all the values in one or more of the rows.

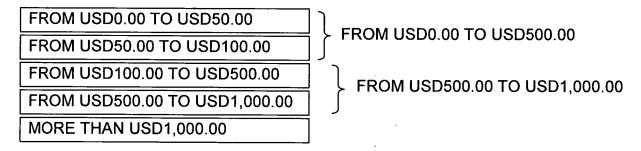
Furthermore, the system disclosed in the present application can use a cross-tabulation table in a variety of ways, while Shoup's invention cannot.

For instance, provided that there are a sales method code and a money amount hierarchy code in addition to the dimensions in the cross-tabulation Table 1, any view in which each cell has different condition dimension value(s) can be output as shown below in cross-tabulation Table 2.

### SALES METHOD CODE



# MONEY AMOUNT HIERARCHY CODE



### **CROSS-TABULATION TABLE 2**

	TYPE-A PRODUCT				TYPE-A PRODUCT FROM USDS00.00 TO USD1000.00			TYPE-B PRODUCT FROM USD1,000.00 OR MORE			TYPE-C PRODUCT COMMISSION				TOTA	TOTAL SALES AMOUNT				
	SALES AMOUNT																			
					SALES AMOUNT			COMMISSION												
AREA 1	Х	X	X	X	X	X	X	X	Х	X	X	X	X	X	X	X	Х	X	X	X
AREA 2	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
AREA 3/	Х	X	X	X	Х	X	X	X	X	X	X	X	X	X	X	X	Х	X	X	X
SALES METHOD R																				
AREA A/	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
SALES METHOD T																				
TOTAL AMOUNT	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

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In this example, the value shown excludes values of conditioned row and column items, e.g. "AREA A/SALES METHOD T."

For instance, the first column indicates only the product code dimension, but the second column indicates two dimension conditions; the product code dimension and money amount hierarchy dimension.

The system disclosed in the present application can create multiple cross-tabulation tables at one time.

If there are a plurality of cross-tabulation tables as mentioned in the above examples, those tables can be created at one time. Consequently, even if only the cross-tabulation Table 1 and cross-tabulation Table 2 were output at the beginning of the processing, another plurality of cross-tabulation tables could be added afterwards.

The system disclosed in the present application refers to not only to creation of cross-tabulation tables but also to a whole batch processing component as well.

Therefore, if the commission of the cross-tabulation Table view 2 is not on the input data, and if it is necessary to calculate the commission by using the below formula, it is possible to cross tabulate the commission within a summary operation processing based on the calculated result obtained by the derivation operation:

 $COMMISSION = SALES AMOUNT \times 0.05$ 

For the foregoing reasons, it is respectfully submitted that this application is now in condition for allowance. Reconsideration of the application is therefore respectfully requested.

Respectfully submitted,

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